

CYRUS ZAL, SBN: 102415  
CYRUS ZAL, A PROFESSIONAL CORPORATION  
102 Mainsail Court  
Folsom, CA 95630  
(916) 985-3576  
(916) 985-4893 (FAX)

Attorney for Plaintiff MARK BALDACCHINO

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

MARK BADACCHINO,  
Plaintiff,

vs.

COUNTY OF EL DORADO, EL  
DORADO COUNTY SHERIFF'S  
DEPARTMENT, JAMIE MORGAN,  
JEREMY GARRISON, HOWARD  
JENCKS and TONY CAMPAGNA,

Defendants.

CASE NO: CIV S-01-1910 MCE DAD

**STIPULATION AND ORDER RE  
CONTINUANCE OF THE HEARING  
DATE ON DEFENDANTS' MOTION  
FOR SUMMARY JUDGMENT**

Date: August 13, 2009  
Time: 2:00 p.m.  
Courtroom: 7, 14th Floor

Before: Judge Morrison C. England, Jr.

Plaintiff Mark Baldacchino ("Plaintiff") and Defendants County of El Dorado, Jaime Morgan, Jeremy Garrison, Howard Jencks, and Tony Campagna (Defendants"), by and through their counsel of record, hereby stipulate to the following:

- WHEREAS**, Plaintiff, due to the press of other deadlines in the office of Plaintiff's attorney, has requested defendants to agree to a one-week continuance to August 20, 2009 of the hearing date for Defendants'

1 motion for summary judgment, currently scheduled to be heard on  
2 August 13, 2009.

3 2. **WHEREAS**, the Defendants are agreeable to the requested one-week  
4 continuance of the Summary Judgment Motion hearing date from August  
5 13, 2009 to August 20, 2009.

6 3. **WHEREAS**, the parties agree that good cause exists and that leave of  
7 court should be granted to allow the requested one-week continuance of  
8 the hearing date with respect to defendants' motion for summary  
9 judgment and that good cause exists to allow a further modification of the  
10 dispositive motion hearing date from August 13, 2009 to August 20,  
11 2009.  
12

13 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED AS**  
14 **FOLLOWS:**

15 1. Good cause exists for a continuance of the hearing date on defendants'  
16 motion for summary judgment from August 13, 2009 to August 20, 2009.

17 2. Good cause exists for a modification of the dispositive motion hearing  
18 date from August 13, 2009 to August 20, 2009.

19 3. The hearing date for defendants' motion for summary judgment shall be  
20 continued from August 13, 2009 to August 20, 2009.  
21

22 **IT IS SO STIPULATED.**  
23  
24  
25

**CAULFIELD DAVIES & DONAHUE, LLP**

DATED: July 27, 2009

By: /s/ Andrew T. Caulfield  
ANDREW T. CAULFIELD  
Attorney for Defendants

**CYRUS ZAL, A PROFESSIONAL CORPORATION**

DATED: July 27, 2009


By: /s/ Cyrus Zal  
CYRUS ZAL, Attorney for Plaintiff  
MARK BALDACCHINO

**ORDER**

Pursuant to the Parties' Stipulation, and cause appearing therefore, the date for defendants' motion for summary judgment is hereby continued from August 13, 2009 to August 20, 2009 and the date for hearing dispositive motions in this matter is hereby extended from August 13, 2009 to August 27, 2009. All other dates contained within the Court's May 1, 2009 Pretrial (Status) Scheduling Order remain unchanged.

IT IS SO ORDERED.

DATED: July 28, 2009

  
MORRISON C. ENGLAND, JR.  
UNITED STATES DISTRICT JUDGE